

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Cause No. 4:21-CR-00155 MTS/SRW
v.)
)
BRENT M. LAWSON,)
)
Defendant.)

**DEFENDANT'S FIRST MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS**

Comes now, Counsel for Defendant, Brent Lawson, and respectfully requests a sixty-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography – Prior Offender.
2. Defense Counsel needs additional time to investigate and research this case.
3. Based on the nature of the discovery in this case counsel must review some the evidence at the United States Attorney's Office. Counsel has been working with the Government to review the evidence; however, Defense Counsel has identified some additional discovery required prior to the review. Counsel has made the request for this discovery to the Government and the Government is working on a response.
4. The requested discovery primarily pertains to information regarding the online investigation into Defendant's IP address which was used to support the affidavit for search warrant.
5. A trial date has not been set for the cause.

6. The Government has no objection to this request for an extension per Assistant United States Attorney Jillian Anderson.

7. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a sixty-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By /s/ Joseph W. Flees
JOSEPH W. FLEES (#60872MO)
Co-Counsel for Defendant
7710 Carondelet Avenue, Suite 350
Clayton, Missouri 63105
(314) 725-7777

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Joseph W. Flees
JOSEPH W. FLEES